INFORMATION SECURITY POLICY

The Board of Directors and management of Exclusive Change Capital Ltd, located at 56 Theodorou Potamianou, 4th Floor, Aphrodite building, 4155, Limassol, Cyprus, which operates in financial services sector, are committed to preserving the confidentiality, integrity and availability of all the physical and electronic information assets, including personally identifiable information (PII), throughout the organization throughout their organization in order to preserve its competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image. Information and information security requirements will continue to be aligned with Exclusive Change Capital Ltd's goals, and the ISMS is intended to be an enabling mechanism for information sharing, for electronic operations, for trading and for reducing information-related risks to acceptable levels.

Scope of the Management System

Provision of services according to the authorization by the Cyprus Securities and Exchange Commission in accordance with the ISMS Statement of Applicability version 2, dated 12th September 2024.

Exclusive Change Capital Ltd is committed to ensuring compliance with all applicable legislative, regulatory and contractual requirements, including all applicable PII protection legislation.

Exclusive Change Capital Ltd current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling information- and privacy-related risks through the establishment and maintenance of an ISMS.

The Risk Assessment, Statement of Applicability and Risk Treatment Plan identify how information- and privacy-related risks are controlled. The Head of Risk is responsible for the management and maintenance of the risk treatment plan. Additional risk assessments may, where necessary, be carried out to determine appropriate controls for specific risks.

In particular, business continuity and contingency plans, data backup procedures, avoidance of viruses and criminal hackers, access control to systems, and information security and privacy incident reporting are fundamental to this policy. Control objectives for each of these areas are contained in the Information Security Manual are supported by specific documented policies and procedures.

Exclusive Change Capital Ltd aims to achieve specific, defined information security and privacy objectives, which are developed in accordance with the business objectives, the context of the organization, the results of risk assessments and the risk treatment plan.

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with registration no. HE 337858, regulated by CySEC under license no. 330/17

All Employees of Exclusive Change Capital Ltd (and certain external parties identified in the ISMS) are expected to comply with this policy and with the ISMS that implements this policy. All Employees, and certain external parties, will receive appropriate training. The consequences of breaching the information security and privacy policies are set out in Exclusive Change Capital Ltd disciplinary policy and in contracts and agreements with third parties.

The ISMS is subject to continuous, systematic review and improvement.

Exclusive Change Capital Ltd has established a top-level management steering group/ Information Security Committee, chaired by Chief Executive Officer (CEO)/Chief Information Security Officer (CISO) and including the Information Security Manager and other executives/specialists/risk specialists to support the ISMS framework and to periodically review the security policy.

Exclusive Change Capital Ltd is committed to achieving certification of its ISMS to (ISO 27001:2022).

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually.

In this policy, 'information security' is defined as:

Preserving

This means that management, all full- or part-time Employees/Staff, sub-contractors, project consultants and any external parties have, and will be made aware of, responsibilities (which are defined in their job descriptions or contracts) to preserve information security and privacy, to report security and privacy breaches (in line with the policy and procedures identified in the Information Security Manual) and to act in accordance with the requirements of the ISMS. All Employees/Staff will receive information security and privacy awareness training, and more specialised Employees/Staff will receive appropriately specialised information and privacy security training.

the confidentiality,

This involves ensuring that information is only accessible to those authorised to access it and therefore preventing both deliberate and accidental unauthorised access to Exclusive Change Capital Ltd information *[and proprietary knowledge]* and its systems *[including its network(s), website(s), extranet(s), and e-trading systems], catering also various GDPR specific control/compliance requirements.]*

integrity

This involves safeguarding the accuracy and completeness of information and processing methods, and therefore requires preventing deliberate or accidental, partial or complete, destruction or unauthorised modification, of either physical assets or electronic data. There must be appropriate contingency [including for network(s), e-commerce system(s), website(s), extranet(s)] and data backup plans along with security and privacy incident reporting

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to Exclusive Change Capital Ltd must comply with all relevant data- and privacy-related legislation in those jurisdictions within which it operates.

and availability

This means that information and associated assets should be accessible to authorised Users when required and therefore physically secure. The computer network must be resilient and to Exclusive Change Capital Ltd must be able to [detect and] respond rapidly to incidents (such as viruses and other malware) that threaten the continued availability of assets, systems and information. There must be appropriate business continuity plans.

of the physical (assets)

The physical assets of to Exclusive Change Capital Ltd, including, but not limited to, computer hardware, data cabling, telephone systems, filing systems and physical data files.

and information assets

The information assets include information (whether PII or otherwise) printed or written on paper, transmitted by post or shown in films, or spoken in conversation, as well as information stored electronically on servers, website(s), extranet(s), intranet(s), PCs, laptops, mobile phones, as well as on CD ROMs, USB sticks, backup tapes and any other digital or magnetic media, and information transmitted electronically by any means. In this context, 'data' also includes the sets of instructions that tell the system(s) how to manipulate information (i.e. the software: operating systems, applications, utilities, etc.). of to Exclusive Change Capital Ltd.

To Exclusive Change Capital Ltd and partners that are part of our integrated network and have signed up to our information security and privacy policy and have accepted our ISMS.

The **ISMS** is the information security management system, of which this policy (the Information Security Manual) and other supporting and related documentation are a part, and which has been designed in accordance with the specifications contained in (ISO 27001:2022).

A **security breach** is any incident or activity that causes, or may cause, a break down in the confidentiality, integrity or availability of the physical or electronic information assets of to Exclusive Change Capital Ltd.

A **privacy breach** is any incident or activity that causes, or may cause, a break down in the confidentiality, integrity or availability of the PII assets of to Exclusive Change Capital Ltd

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